

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
AT KNOXVILLE, TENNESSEE**

In Re:

A&B LODGING THREE, LLC

Docket No: 3:17-bk-32968

Debtor

APPLICATION OF DEBTOR TO EMPLOY ATTORNEYS

The applicant A&B Lodging Three, LLC, the Debtor herein, by and through counsel, pursuant to 11 U.S.C. §327 and Bankruptcy Rule 2014(a), hereby files its Application to Employ Attorneys, and in support thereof would state and show unto the Court as follows:

1. Debtor filed a Petition under Chapter 11 of the United States Bankruptcy Code on September 27, 2017.
2. The Debtor requires assistance of attorneys for the purpose of representation herein relative to: preparing and filing bankruptcy statements and schedules, negotiating cash collateral orders, preparation of disclosure statements and plan of reorganization, negotiations with creditors regarding claims, appearances in Court, and general legal and bankruptcy advice and representation.
3. It is in the best interest of this estate and its economic administration that the Debtors be authorized to employ Barry W. Eubanks of Eubanks Law Firm, PC, 209 Chilhowee School Road, Ste. 16, Seymour, TN 37865 to act as attorney for the Debtors and for the estate for the above purposes.

4. Barry W. Eubanks and the other members of Eubanks Law Firm, PC are duly admitted to practice before this Court and other necessary State and Federal Courts in this jurisdiction and have experience with regard to the above matters.

5. To the best of Debtor's knowledge, neither Barry W. Eubanks nor the other members of Eubanks Law Firm, PC have any connection with the Debtors, creditors, or other parties in interest, their respective attorneys or accountants.

6. To the best of Debtor's knowledge, Barry W. Eubanks and Eubanks Law Firm, PC do not hold or represent an interest adverse to the estate, and are disinterested persons within the meaning of 11 U.S.C. §101(14) and are eligible to serve as counsel for the Debtor and the estate pursuant to the provisions of 11 U.S.C. §327.

7. The proposed arrangement for compensation contemplates compensation for services rendered at an hourly rate plus out-of-pocket expenses as follows: Barry Eubanks: \$250.00 per hour, paralegals \$65.00 per hour.

8. Eubanks Law Firm, PC has accepted a retainer in the amount of \$7,533.00 for legal fees and the required filing fee, paid by Anjuben Patel \$4,000.00 and Sunilkumar Patel \$5,250.00. No cash collateral was used to pay the retainer and filing fee. The fee agreement is personally guaranteed by Ajay Khatri.

9. The Debtor believes that the employment of Barry W. Eubanks and Eubanks Law Firm, PC is in the best interest of the Debtor and the estate.

10. No compensation will be paid to said attorneys except upon application to and approval by this Court after notice and a hearing.

WHEREFORE, the Debtors pray that pursuant to 11 U.S.C. §327, Barry W. Eubanks and Eubanks Law Firm, PC be authorized as of the date of the filing of the bankruptcy Petition to act as

attorneys for the Debtor and the estate for the purposes set forth herein with compensation for such legal services to be paid in such amounts as this Court may hereafter allow as an administrative expense of the bankruptcy estate.

Respectfully submitted this the ^{4th}29 day of September, 2017.

EUBANKS LAW FIRM, PC



Barry W. Eubanks, BPR #009165
209 Chilhowee School Road, Ste 16
Seymour, TN 37865
(865) 299-4023

VERIFIED STATEMENT

I, Barry W. Eubanks, declare that to the best of my knowledge, neither I nor the other attorneys in the firm of Eubanks Law Firm, PC, have any connection with the Debtors, creditors or any parties in interest, their respective attorneys or accountants, and do not hold or represent an interest adverse to the estate and are disinterested within the meaning of the Bankruptcy Code.

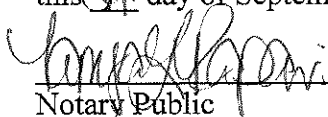
I, Barry W. Eubanks, declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

This the ^{4th}29 day of September, 2017.



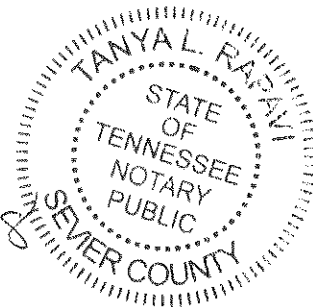
Barry W. Eubanks

Sworn to and subscribed before me
this ^{4th}29 day of September, 2017.



Notary Public

My Commission Expires: 8/25/18



CERTIFICATE OF SERVICE

I, Barry W. Eubanks, certify that I have forwarded a true and exact copy of the foregoing Application of Debtors to Employ Attorneys and Order Approving Attorneys for the Debtors, by U.S. Mail (USM) and/or electronic mail (ECF), postage prepaid, this 27th day of September, 2017, to:

Attorney for United States Trustee
U.S. Department of Justice
Office of the United States Trustee
800 Market Street, Suite 114
Knoxville, TN 37902



Barry W. Eubanks